

United States Courts  
Southern District of Texas  
FILED

DEC 18 2019

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

PANAGIOTA TSIGELIS,  
aka PAMELA TSIGELIS,  
Defendant.§  
§  
§  
§  
§  
§  
§

CRIMINAL NO. 19 CR 908

Counts 1-34: 18 U.S.C. § 641

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNTS 1-34**Theft of Government Property – 18 U.S.C. § 641**

On or about the dates listed in the table below, within the Southern District of Texas,

**PANAGIOTA TSIGELIS,  
aka PAMELA TSIGELIS,**

defendant herein, willfully and knowingly did embezzle, steal, purloin, and knowingly convert to her own use and the use of another money of the United States, namely, Social Security retirement benefits erroneously directed to Jay Johnson, who had passed away on September 30, 2008, which funds defendant was not entitled to receive.

<i>Count</i>	<i>On or About</i>	<i>Amount</i>
1	January 2, 2015	\$899.00
2	February 3, 2015	\$899.00
3	March 3, 2015	\$899.00
4	April 3, 2015	\$899.00
5	May 1, 2015	\$899.00
6	June 3, 2015	\$899.00
7	July 2, 2015	\$899.00
8	August 3, 2015	\$899.00
9	September 3, 2015	\$899.00
10	October 2, 2015	\$899.00
11	November 3, 2015	\$899.00
12	December 3, 2015	\$899.00

13	December 31, 2015	\$899.00
14	February 3, 2016	\$899.00
15	March 4, 2016	\$899.00
16	April 1, 2016	\$899.00
17	May 3, 2016	\$899.00
18	June 3, 2016	\$899.00
19	July 1, 2016	\$899.00
20	August 3, 2016	\$899.00
21	September 2, 2016	\$899.00
22	October 3, 2016	\$899.00
23	November 3, 2016	\$899.00
24	December 2, 2016	\$899.00
25	January 3, 2017	\$899.00
26	February 3, 2017	\$899.00
27	March 3, 2017	\$899.00
28	April 3, 2017	\$899.00
29	May 3, 2017	\$899.00
30	June 2, 2017	\$899.00
31	July 5, 2017	\$899.00
32	August 24, 2017	\$899.00
33	September 1, 2017	\$899.00
34	October 3, 2017	\$899.00

All in violation of Title 18, United States Code, Section 641.

**NOTICE OF CRIMINAL FORFEITURE**  
**(28 U.S.C. § 2461(c); 18 U.S.C. § 981(a)(1)(C))**

Pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C), the United States gives notice to the defendant,

**PANAGIOTA TSIGELIS,**  
**aka PAMELA TSIGELIS,**

that in the event of conviction of the offense charged in this Indictment, the United States intends to seek forfeiture of all property, real or personal, which constitutes or is derived from proceeds traceable to such offense.

**Money Judgment and Substitute Assets**


The United States may seek imposition of a money judgment against the defendant. In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendant in substitution up to the total value of the property subject to forfeiture.

A True Bill:

ORIGINAL SIGNATURE ON FILE

Grand Jury Foreperson

RYAN K. PATRICK  
United States Attorney

By:   
Benjamin C. Sandel  
Special Assistant United States Attorney